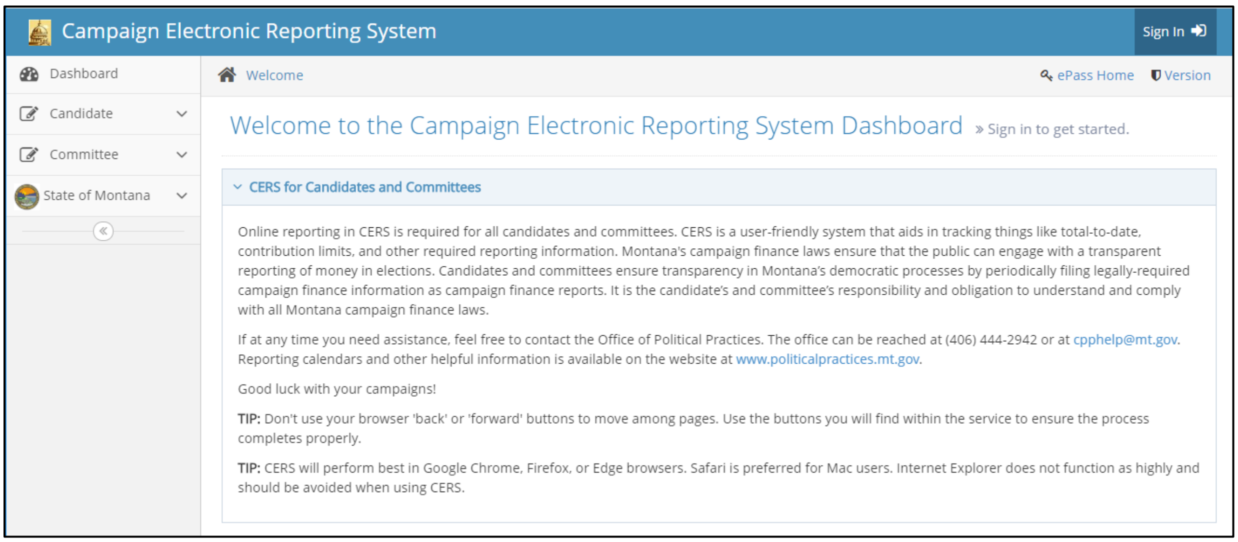
Candidate and Treasurer Guide to Navigating the Campaign Electronic Reporting System (CERS)



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Introduction to the Campaign Electronic Reporting System

What is the Campaign Electronic Reporting System (CERS)?

Online reporting in CERS is required for all candidates and committees (13-37-225, MCA)**.** CERS is a user-friendly system that helps candidates and committees disclose and report the money they receive and spend to support or oppose candidates and ballot issues.

Montana's campaign finance laws ensure that the public can engage with a transparent reporting of money in elections. Each campaign finance report filed in CERS is publicly available and searchable (data is not public until the report is filed). Candidates and committees ensure transparency in Montana's democratic processes by filing legally-required campaign finance reports. Campaign finance reports are reviewed by the Office of Political Practices (13-37-121[1], MCA).

COPP Compliance Specialists are available full-time during work hours (8:00 a.m. to 5:00 p.m., Monday-Friday) to provide campaign finance reporting support to candidates and committees.

Who must use CERS to Register as a Candidate and Disclose Campaign Finance Reporting?

In accordance with 13-37-225 and 226 MCA, all candidates (statewide, state district, county, municipal, and school candidates) must:

1. File all forms electronically in the Campaign Electronic Reporting System (CERS).
2. All candidates will follow the same reporting schedule (See the Reporting Calendars webpage for report periods and report due dates).

To register, all candidates must first create a CERS account. Then, the candidate must file a Statement of Candidate. This same account will be used to enter campaign finance reports.

Creating a CERS account and filing a Statement of Candidate is detailed below in Part 1.

BEST PRACTICES REMINDER: The Office of the Commissioner of Political Practices strongly recommends that candidates run every campaign expenditure out of their campaign bank account.

- Best practices would be for candidates to obtain a debit card attached to the campaign bank account to use for all campaign expenditures. Exclusive use of a debit card connected to the campaign bank account when making campaign expenditures ensures that campaign funds are utilized and simplifies reporting requirements for the candidate.
- Exclusive use of a campaign debit card also reduces the chances that a candidate would need to provide personal banking records or other personal financial information to the COPP in the event a campaign finance complaint is filed. Limited use of a candidate's personal bank account or funds for campaign purposes is allowable if the activity is properly reported and disclosed by the candidate.

Part 1: File a Statement of Candidate in CERS

Step 1: Access the CERS system

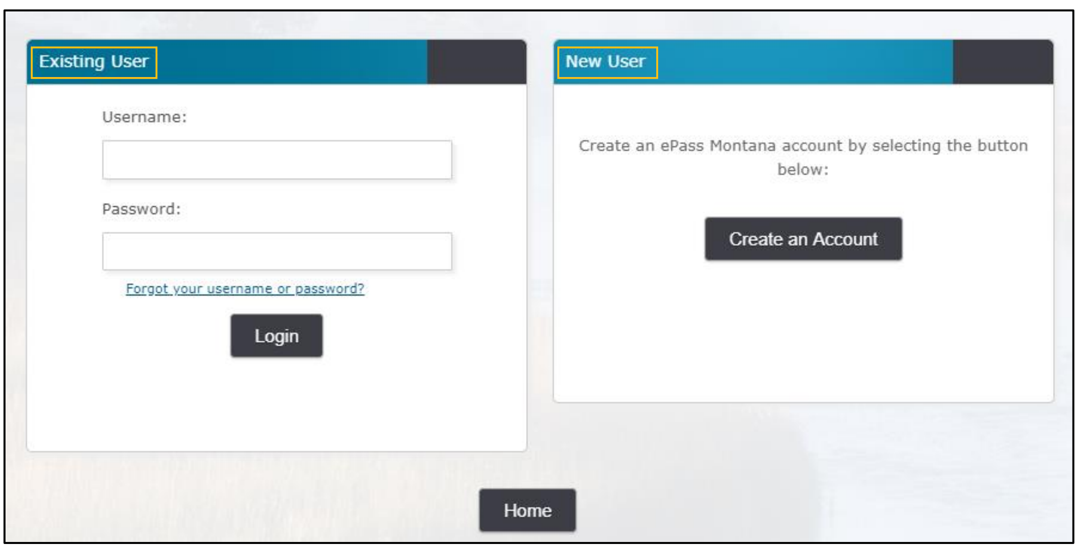
What is ePass? New users should note that the Campaign Electronic Reporting System (CERS) is a standalone system that is directly administered by the Office of Political Practices. To access CERS, you must log in via ePass Montana. ePass is a State of Montana application that is not unique to the COPP but is used as a portal to access a variety of statewide resources. While users must use ePass to log into CERS, the two systems are different. Whereas CERS is administered directly by the COPP, ePass is not.

Each candidate must log into their ePass account to access CERS. To access the CERS system:

1. Visit the COPP's website, www.politicalpractices.mt.gov. Click on the Online Services tab, and then the 'Access the Campaign Electronic Reporting system (CERS)' link

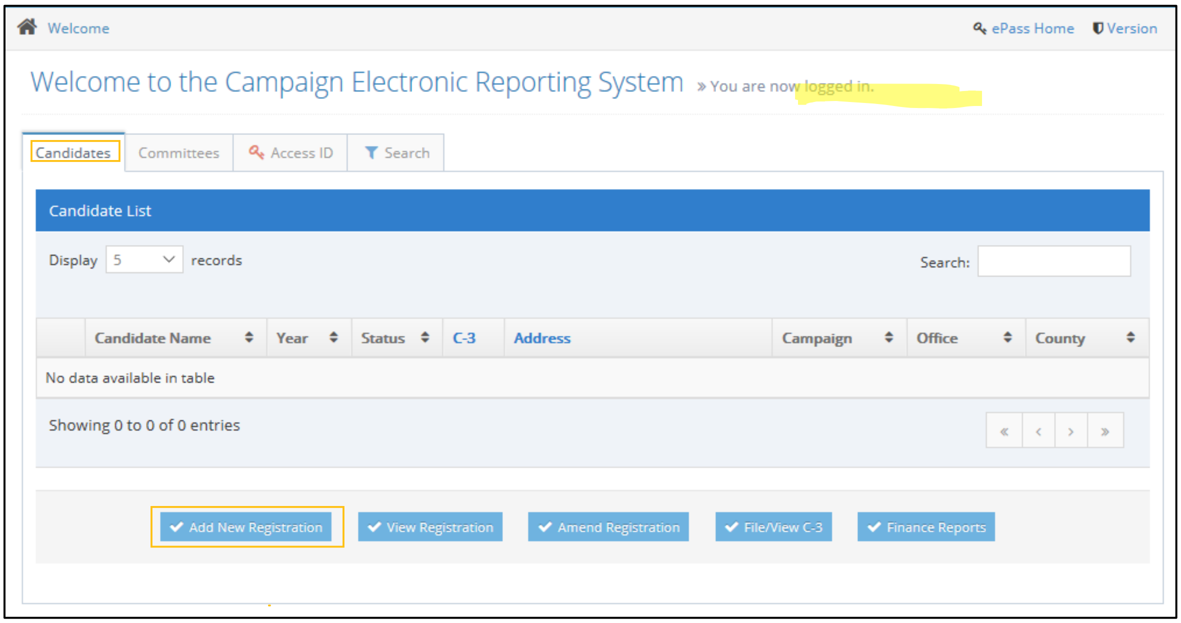
2. From the CERS dashboard, select the **Sign In** (with arrow) icon. This will take you to the ePass Montana login

3. Access CERS via ePass:
    - *If you already have an active ePass Montana account*, you may log in using that username and password.
    - *If you do not already have an active ePass account or* cannot remember your login information, Click the **Login** button. From there, ePass gives you the option to create a new account (See the New User section on the ePass home page).
    - If you have trouble accessing your ePass account, or do not remember your account's username or password, you can reset the username or password through ePass itself. **The COPP cannot assist you with resetting an ePass account username or password or retrieving an existing username or password you have forgotten.**



4. After you successfully login via ePass, you will automatically be redirected back to the CERS dashboard. If you are experiencing difficulty logging in to ePass or are not re-directed to the CERS dashboard after loggin in to ePass, please contact the COPP for assistance.

5. To register a new candidate or campaign for a new election, make sure you have selected the **Candidates** tab, and then click **Add New Registration** (See image below).



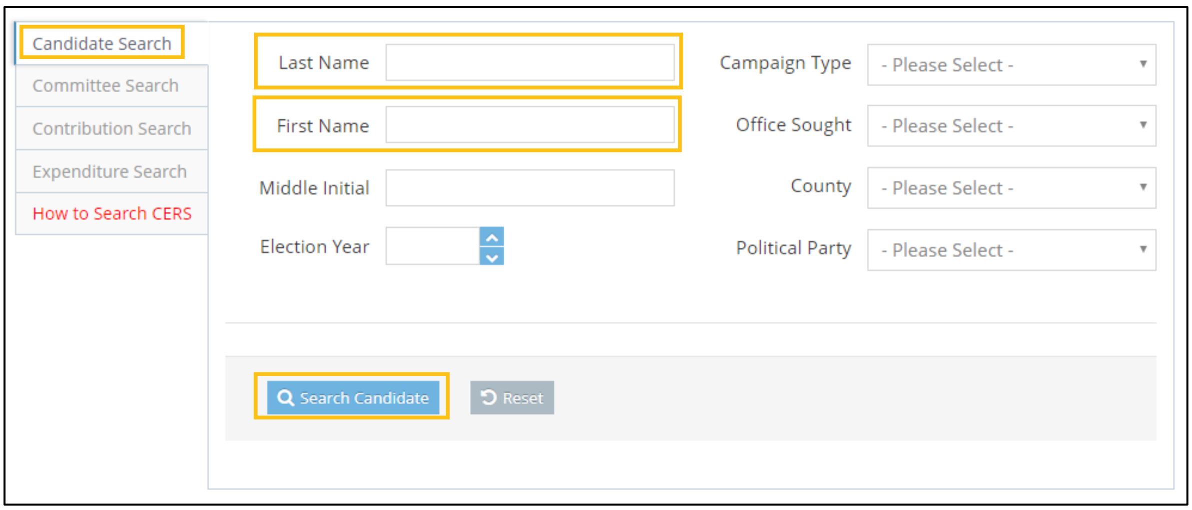
Step 2: Determine if Your Candidate Name Already Exists in CERS. If Needed, Register Name

Before you can add a new registration, the CERS system requires you to search for the candidate's name. This search avoids duplicate entries for the same candidate for a single election year. *If* the candidate has previously filed a Statement of Candidate in CERS, correctly searching and finding their name will auto-populate previously entered information (e.g. candidate and treasurer contact and mailing information).

Regardless of whether you have ever filed a Statement of Candidate in CERS, you must search for the candidate name. To search:

1. Fill out the candidate's last name and first name.

2. Then, click the **Search Candidate** button.



3. *If the candidate previously registered* in the CERS system for a prior election year, select that candidate by clicking the box to the left of the prior registration for that candidate, and select the **Add New Registration** icon. Continue to Step 3 (page 6).

4. *If the candidate's name does come up* for the current election year, that means that the candidate has already registered in the CERS system for that current election year. If this is the case, ***please contact the COPP for assistance accessing the existing account*** instead of creating a second profile.

5. *If the candidate's name does not come up* from a search, click **Add New Registration** to add a new registration for that candidate for the current election year. Continue to Step 3 (page 6).

Step 3: Enter in Candidate Campaign Information

1. Click the upper dropdown option from the Statement of Candidate form and select your **Campaign Type** (City, County, School, State District, or Statewide).
    a. Are you uncertain which specific office you will run for? Read about your options for filing as an exploratory candidate here.

2. Fill out all information in the **Candidate Information** section. Any field with an *asterisk* is a required field that must have data entered.
    a. In the field "Official campaign email address," the email address entered will receive notifications about filed campaign finance reports. This email address will also receive communications from the Office of Political Practices (e.g. with report reminders, training opportunities, etc.).
    b. City, county, and school candidates must select whether their campaign will have a combined total of contributions and expenditures of $500 or more in the **Affidavit of Reporting Status** section. Select option B box for campaigns that will spend and receive under $500 combined, or option C for campaigns that will spend and receive over $500 combined (Statewide and State District candidates will not see this field).
    c. For information about campaign bank requirements, click here.

3. Fill out information in the **Campaign Treasurer Information** section.
    a. A treasurer must be appointed and certified on the Statement of Candidate form. Candidates can appoint themselves to be their own treasurers. If there are changes, an amended candidate statement (C-1 or C-1A form) must be submitted within 5 days.
    b. Treasurers are responsible for depositing and disbursing funds and keeping accurate accounts. The treasurer and deputy treasurer are the only people authorized to make deposits or draw checks on the campaign account.
    c. Often candidates appoint themselves as either treasurer or deputy treasurer so they have access to their campaign accounts.

4. If relevant to your campaign, fill out the **Deputy Treasurer Information** section. Not all campaigns will have a Deputy Treasurer. You will need to select the purple **Add** button, enter in the deputy treasurer's information, and click **Submit.**

5. When all candidate information is entered, select **Save** at the bottom of the page.

6. Verify all candidate information is correct. If you need to make edits, click the **Edit Information** button, update info, and then click **Save.**

7. Certify all information is true by clicking the **Certification** box at the bottom of the page.

8. Select **Submit and File**.

9. You will now receive an email verifying your successful filing to the email address you provided.

10. You have the option to file a Form C-3 (Code of Fair Campaign Practices) in CERS. Any candidate who desires to subscribe to the Code of Fair Campaign Practices may file a Form C-3. Signing the form is voluntary, and a failure or refusal to sign is not a violation of election law.

11. You will now be able to navigate back to your CERS homepage. From this page, you can:
    a. Add a new registration or campaign finance report,
    b. View your registration,
    c. Amend your candidate statement or a campaign finance report,
    d. File and view C-3, and
    e. Create finance reports (Finance Reports).

Step 4: How to Update a Statement of Candidate

If any of the information in a candidate's statement of candidate changes, the candidate must file an amended Statement of Candidate that provides the new information within five days after the change occurs (13-37-204, MCA, 44.11.303(2), ARM).

Your candidate registration must be updated in CERS if any of the below information changes:

- The campaign type,
- Candidate, treasurer, or deputy treasurer contact information (address, email, phone number, etc.),
- Political party, and
- Bank information.

To amend a candidate's registration:

1. Navigate to the CERS' homepage, and login via ePass Montana.
2. Check the box next to the candidate's name to select their current registration and click **Amend Registration.**

3. Edit and amend the relevant information in the candidate's Statement of Candidate. Click **Save**.
4. Finally, check and certify that the registration information is true, complete, and correct, and then select **Submit and File** to save the updates.

Part 2: Create a Campaign Finance Report

Select the Campaign Finance Report Type (C-5 or C-7, C-7E) and Set the Reporting Period

Once logged into CERS, candidates can easily file campaign financial reports. Click the **Access My Accounts** button on the **Welcome** page (see below).

CERS TIPS:

1. A new campaign finance report cannot be created if a prior report has a status of 'Pending.'
2. Finance reports can be amended at any time after they have been successfully filed (See Part 9 for details on amending reports).
3. Campaign finance data can be entered at any time. Data is not public until a report has been filed.

Select the candidate campaign account by checking the box next to the relevant election year and select the **Finance Reports** button.

From the following page, select the relevant campaign finance report to add (**Add New C5, Add New C7,** or **Add New C7E**).

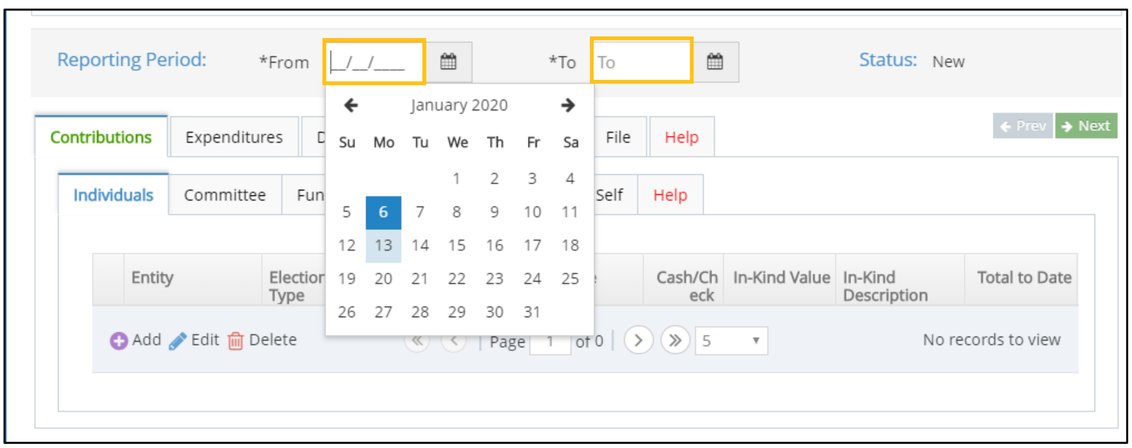
- **Form C-5** details all contributions received and expenditures made by a campaign during a specific time frame and must be filed periodically by all candidates who will receive or spend a total of $500 or more for their campaign (13-37-226, MCA).

- **Form C-7**, the Notice of Pre-Elections Contributions, must be filed by any candidate who receives $100 or more from a single source between the 16th day before an election and the date of the election (for both primary and general elections) and must be filed within two business days after receipt of a contribution of $100 or more (13-37-226, MCA).

- **Form C-7E**, the Notice of Pre-Election Expenditures, must be filed by any candidate who makes a campaign expenditure or incurs a debt of $100 or more between the 17th day before an election (for both primary and general elections) and the day of the election must. Form C-7E must be filed within two business days of the expenditure being made or the debt being incurred (13-37-226, MCA).

- **Other Campaign Finance Reports** such as the D-1 Business Disclosure and the post-election C-8, C-118, and C-118C forms must be filed as paper copies. Reference this webpage for more details.

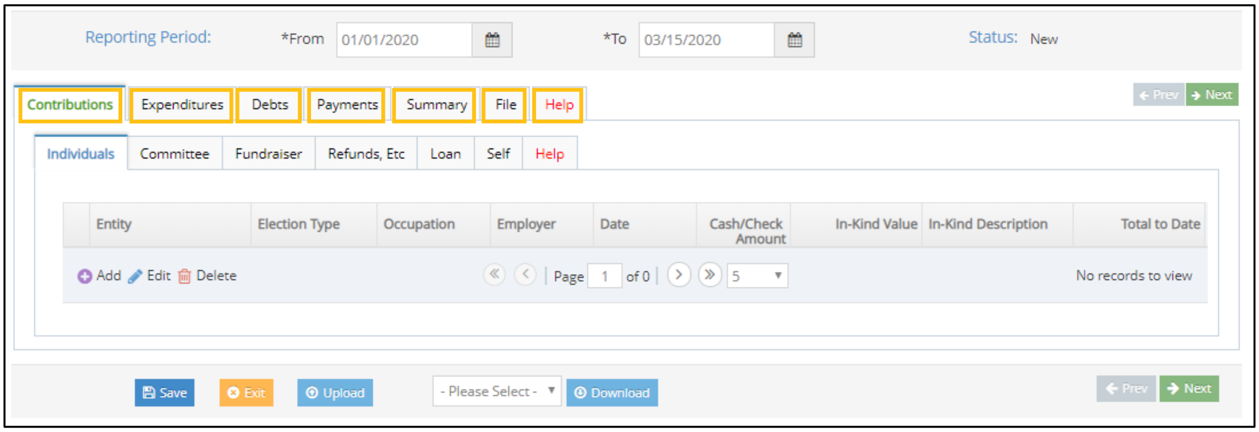
After creating a new finance report, select the date range the report will cover by using the dropdown calendar option (see image below).



This time period must mirror the reporting periods as defined on the COPP's reporting page. The time period covered by the report includes up to the fifth day before the due date of the appropriate report. All accounts must be current up to the fifth day before the report due date.

Navigate Tab Options in CERS (E.g. Contributions, Expenditures, Debts, Payments, etc.)

Campaign finance information is entered into the CERS system by candidates or treasurers via the following tabs (the functions and purpose of each tab are detailed in Part 3 through Part 9):



1. **Contributions**
   By law (13-1-101(9), MCA), a contribution is defined as a "…distribution of money or anything of value to support or oppose a candidate or ballot issue." If an individual, political committee, or other entity provides a campaign with money or goods or services of value for free or at a reduced rate in an effort to support your candidacy, that would be considered a contribution. In the Contributions tab, report contributions received from 1) individuals, 2) committees, 3) fundraisers, 4) refunds, etc., 4) loans, and 5) candidate contributions (contributions made personally by the candidate).

2. **Expenditures (Expenses)**
   By law (13-1-101 (17) (a), MCA), an expenditure is defined as "a purchase, payment, distribution, loan, advance, promise, pledge, or gift of money or anything of value made by a candidate or political committee to support or oppose a candidate or ballot issue." Expenditure details must be disclosed in the **Expenditures** tab. An expenditure is any money a campaign spends in support of that candidate. There are a few exceptions that do not need to be reported (13-1-101(18) (b), MCA).

3. **Debts**
   A candidate must report the full name and mailing address of each person or entity to whom the campaign owes a debt or financial obligation. Debt details must include: the amount, the date the debt or obligation was contracted, and the purpose of the debt or contracted obligation. If the exact amount is unknown at the time of filing, the estimated debt amount must be reported (44.11.506 ARM).

4. **Payments**

   A candidate must report information about all payments made on the campaign's outstanding debts or loans in the **Payments** tab. In this tab, previously reported debts or loans can be selected to record payments.

5. **Summary**

   The **Summary** tab keeps a running total of money received and spent by the campaign during the current reporting period. The summary details the campaign's bank balance at the start of the reporting period, all reported contributions received by the campaign, total campaign expenses, and the ending bank balance for both the primary and general election accounts.

6. **File**

   The **File** tab is where the final steps of filing a campaign finance report are completed. To file a report, check the box to certify that all information is correct, and then click the "Certify and File" button.

7. **Help**

   Help tabs are available at both the main tab and subtab levels. Reference these for tab overviews, tips, and links to resources and Montana campaign finance law.

Part 3: Add Contributions in CERS

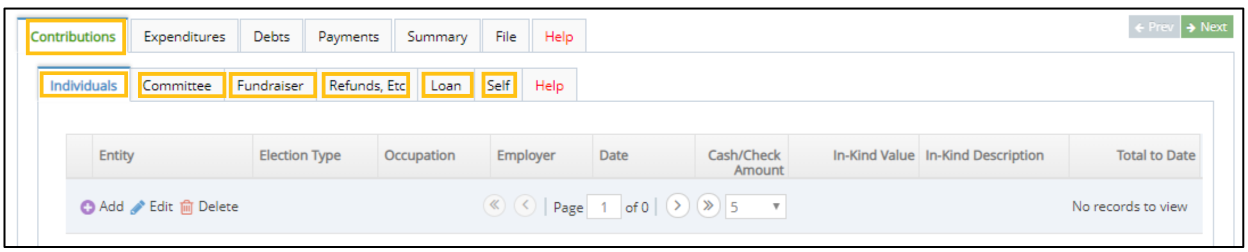
Types of Contributions

Contributions can come from: individuals, committees (political committees, political action committees (PACs), and political party committees), and the candidate.

Contributions limits exist for both a primary and general election and apply to all contributions received from committees or individuals (candidate contributions to their own campaign are exempt from contribution limits).

If a candidate does not have a primary election, they can receive contributions *only* for the general election. Reference this link for information on bank requirements if a candidate may have both a primary and a general election.

All contributions are entered into CERS under the **Contributions** parent (main) tab. A contribution will be entered in the below subtabs based on the contribution type.



1. Individual Contributions

Contributions received from individuals must be entered in the "Individuals" tab. Individual contribution details must include whether the contribution is designated for the primary or general election, the date the contribution was received, information about the individual (name, address, employer and occupation are all required for individuals who contribute $35 or more), and whether it was a monetary or in-kind contribution. All in-kind contributions must include a description of the specific items or services received by the campaign.

** Individual contribution limits apply to all contributions received from individual donors and aggregate contributions are automatically tracked by CERS. Candidates cannot accept anonymous contributions. Details at 13-37-217 MCA.**

2. Committee Contributions

Contributions received from a political committee must be entered in the "Committee" tab. Committee contribution details must include: whether the contribution is designated for the primary or general election, the date the contribution was received, information about the committee (committee type, committee name, and the committee address), and whether the contribution was a monetary or in-kind contribution. All in-kind contributions must include a description of the specific items or services received by the campaign.

** Committee contribution limits apply and aggregate contributions are tracked and displayed in CERS.**

3. Fundraiser Contributions

Contributions of $35 or less received at mass collection events (pass-the-hat event, selling campaign t-shirts, raffle tickets, an auction, etc.) may be recorded and reported in the "Fundraiser" tab as one lump sum entry. Each individual fundraising event held by the campaign should be reported separately as its own event. For example, if you held a fundraising dinner that also had a silent auction and a pass-the-hat activity, that represents three required reporting activities (dinner, silent auction, pass-the-hat).

Reported fundraiser information must include: whether the contributions received at the event go to the candidate's primary or general account, the date and location of the event, the type of event, the approximate number of attendees, the number of tickets sold (if relevant), and the total amount raised (44.11.406 ARM).Any individual contributions of $35 or more received at a fundraiser event must be reported in the Individual Contributors section of the report.

** Anonymous contributions are illegal. The source of contributions from a fundraiser must always be recorded, even if an individual's fundraising-related contribution does not meet the $35 reporting threshold. This also ensures that if an individual contributes $35 in the aggregate or more, their contributions can be correctly reported (Any individual contribution of $35 or more must be reported under the "Contributions" tab's "Individual" option). **

4. Refunds, Etc.

The "Refunds, etc." tab is where refunds, rebates, or other indirect contributions received by the campaign are reported. An example would be interest earned from the campaign's bank account, rebates given to a campaign for bills already paid to vendors, or refunds given to a campaign for services the campaign reported paying for but were not actually provided, so the money was returned to the campaign by the vendor.

5. Loan Contributions

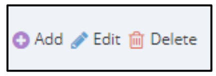
By definition, any loan to a campaign is a contribution (ARM, 44.11.405). All contribution limits apply to campaign loans. Any loan (regardless of its amount) made to the campaign during the current reporting period is reported in the "Loans" tab, even if the loan is repaid during the same reporting period. A candidate would report their own personal loans made to their campaign in this "Loans" subtab (reference this step-by-step guide). Any repayment for a loan is reported in the Payments tab.

6. Self Contributions

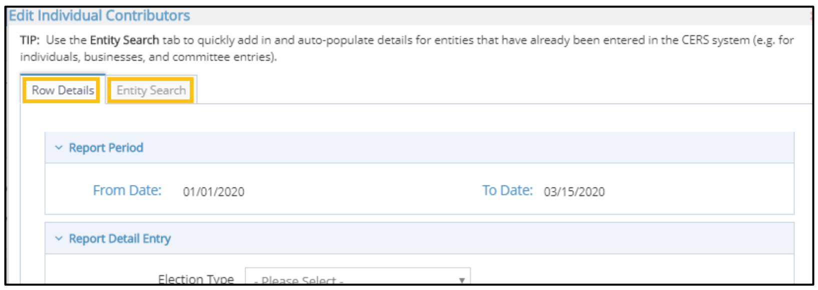
Contributions made from a candidate to their own campaign are entered in the "Self" tab.

Add a New Contribution

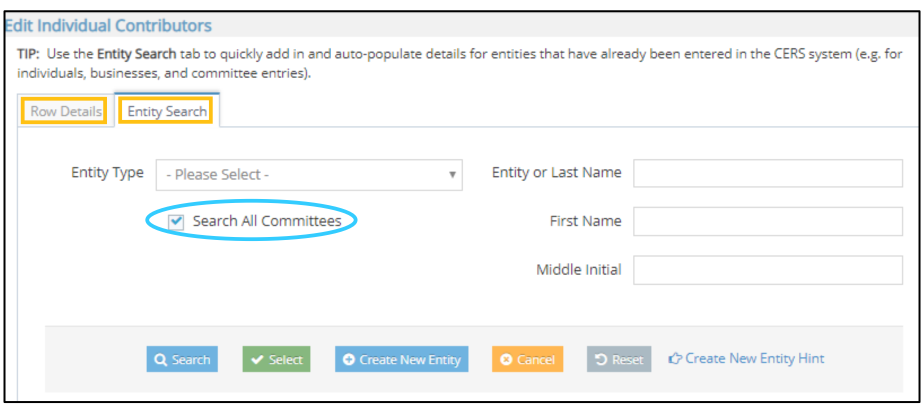
To add in contribution information, open the relevant Contributions subtab (Individual, Committee, Fundraiser, Refunds, Etc., Loan, or Self), and select the purple **Add** button. Contribution information can also be **edited** and **deleted** in the subtabs.



Once the purple **Add** button has been selected, the below screen will appear. Within the screen, there are two tab options: **Row Details** and **Entity Search**.



The **Entity Search** tab is a great way to streamline entering in contribution data. This tab gives users the option to auto-populate previously entered contributor information. If an individual or entity has already been entered into CERS, this search option allows the information to be pulled up and does not require a manual entry.



To search for an individual or entity to identify them as the source of a contribution:

1. Select the **Entity Type** (Bank, Business, or Individual).
2. Enter in the entity or individual's name.
3. Make sure to select the **Search All Campaigns** box to search data beyond the data your campaign has entered in CERS.
4. Select the **Search** button to see if the entity or individual already exists in the system.
   i. *If* the correct information is in the "Entity Search Results" section, check the box next to the relevant entity, and hit **Select.** You will then be redirected automatically to the **Row Details** screen.

ii. *If* no “Entity Search Results” appear, click **Create New Entity** to manually enter the information. Once the information is entered, click **Submit**. The next screen redirects to the **Row Details** screen.

The **Row Details** tab is where users enter specific and identifying information about campaign contributions.

1. Select the “Election Type” dropdown to designate the election the contribution will support (Primary or General),
2. The date the contribution was received (the date the contribution was received by the campaign must be used, ***NOT*** the date the contributions was deposited into the campaign account),
3. If the contributor was not found in the **Entity Search** tab, enter in the information to identify the contributor source (e.g. name, address, occupation and employer for individual contributions, the committee type, name, and address for committee contributions).
4. An **in-kind contribution** means the furnishing of services, property, or rights without charge or at a charge which is less than fair market value (44.11.702, ARM). Frequently, in-kind contributions come in the form of services for which charges usually are made but which are rendered to the campaign free of charge or at a discounted amount. If something is sold to the campaign at less than fair market value, the difference must be recorded as an in-kind contribution. A detailed description is required for all in-kind contributions.
5. The **In-Kind Description** section must describe the in-kind contribution the candidate has reported receiving and must be detailed enough to distinguish between items or services that may be similar in nature.
6. When entering data into the **Refunds, Etc.** tab, select the dropdown **Transaction Type** (Refund, Rebate, Interest, Other), and add in information about the original transaction (date, description).

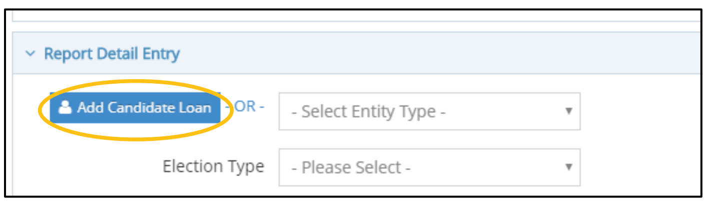
Once all contribution details have been entered into the **Row Details** section, select the **Submit** button, and then select the blue **Save** button.

The **Save** button must be selected after every entry or the CERS system may override that entry or duplicate the entity for each subsequent entry you make.

1. *Reporting Payment for a Candidate's Personal Expenditure Made on Behalf of Their Campaign*:

For a candidate to reimburse themselves for personal expenditures made on behalf of the campaign, the candidate must first report the activity as **a loan** provided to the campaign. This provides candidates two (2) options:

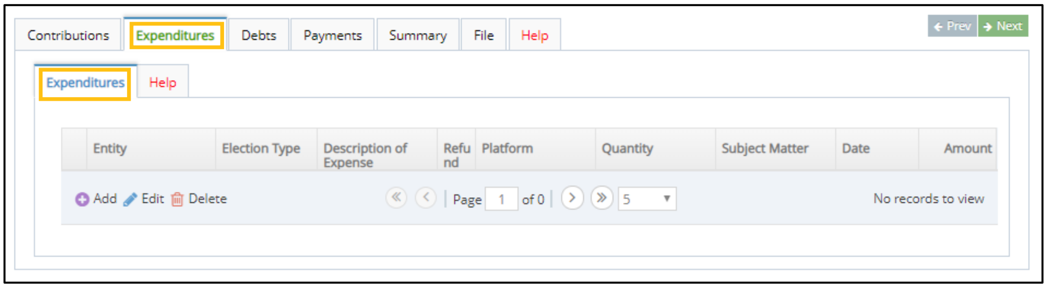
Option 1 is for the candidate to provide a direct monetary loan from their personal bank account to the campaign, depositing those funds in the campaign bank account. This monetary transfer would be reported as a loan from the candidate in **Contributions** tab and the **Loan** subtab the on the relevant campaign financial report. A candidate may use campaign funds to reimburse themselves for any monetary loan they have made to their own campaign. Reimbursement payments made from the campaign account would be recorded using the Payments tab.



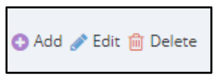
Option 2 is for a candidate to report each campaign expenditure made using their personal bank account or personal funds as an in-kind loan from the candidate in the **Contribution** tab's **Loan** subtab. Each In-Kind loan must provide the date the activity was carried out, the monetary value of the activity, the name of the vendor or business entity the candidate originally paid, and an in-kind description of the nature of the specific item(s) or service(s) provided. This description would require the same level of detail or information as is required for campaign expenditures. Any reimbursement payments made from the campaign account back to the candidate would be recorded using the **Payments** tab.

Part 4: Add Expenditures in CERS

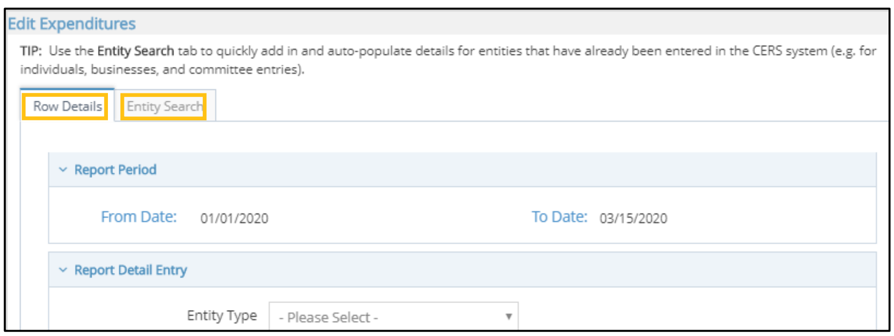
All campaign expenditures must be entered in the **Expenditures** subtab.



To add in an expenditure, select the **Expenditures** subtab, and click the purple **Add** button. Expenditure information can also be **edited** and **deleted** in this subtab.



Once the purple **Add** button has been selected, the below screen will appear. Within the screen, there are two tab options: **Row Details** and **Entity Search**.

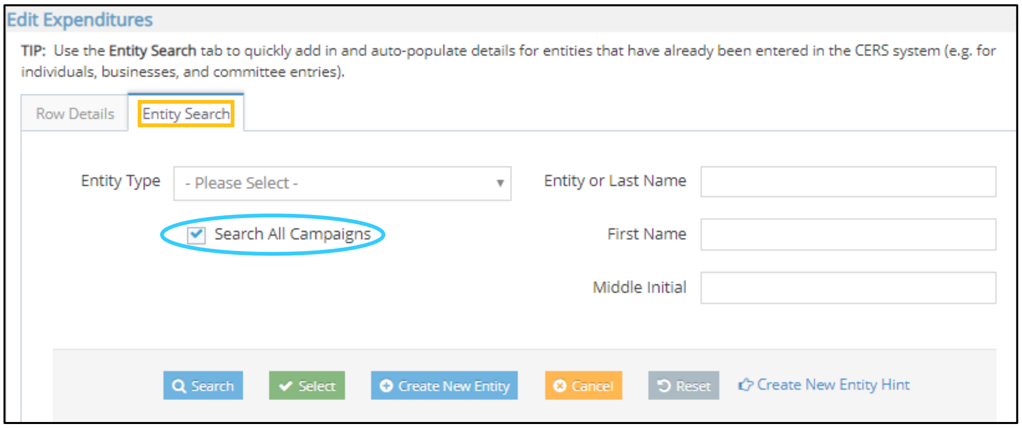


The **Entity Search** tab is a great way to streamline entering in expenditure data. This tab gives users the option to auto-populate previously entered expenditure information. If an individual or entity has already been entered into CERS, this search option allows the information to be pulled up and does not require a manual entry.

To search for an individual or entity to identify them as the source of an expenditure,

5. Select the **Entity Type** (Bank, Business, or Individual).
6. Enter in the entity or individual's name.
7. Make sure to select the **Search All Campaigns** box to search data beyond the data your campaign has entered in CERS.
8. Select the **Search** button to see if the entity or individual already exists in the system.
    i. *If* the correct information is in the "Entity Search Results" section, check the box next to the relevant entity, and hit **Select.** You will then be redirected automatically to the **Row Details** screen.

ii. *If* no "Entity Search Results" appear, click **Create New Entity** to manually enter the information. Once the information is entered, click **Submit**. The next screen redirects to the **Row Details** screen.



The **Row Details** tab is where users enter specific and identifying information about campaign expenditures.

1. If the expenditure was not found in the **Entity Search**, enter in the information to identify the expenditure entity (e.g. name, address),
2. Select the "Election Type" dropdown to designate the election the expenditure was made for (Primary or General),
3. "Date" represents the date the expenditure was paid to the individual, business, or other entity.
4. The amount of the expenditure,
5. Check the box if the expenditure is a refund for a contribution that was over the contribution limit,
6. Under "Description of Expense," candidates are required to disclose expenditure details to provide sufficient detail so expenditures are both distinguishable from other expenses and are easily attributed back to their source. Paid communications must identify: 1) the material's platform/medium, 2) quantity of the materials and/or the dates the paid material(s) ran, and 3) the material's subject matter. See this link for guidance on reporting paid communications.
7. Once an expenditure's details have been entered into the **Row Details** section, select the **Submit** button, and then select the blue **Save** button. The **Save** button must be selected after every entry or the CERS system may override that entry or duplicate the entity for each subsequent entry you make.

PLEASE NOTE that the CERS software limits each field description to a 150-character limit. If more detail is needed, include an addendum. To add an addendum for an expenditure,

1. First, note in the **Description of Expense** description "See addendum: brief item description" (e.g See addendum: Facebook ads 01/01-05/31/20).
2. Then, email a copy of the addendum to cppcompliance@mt.gov and explain that the addendum goes with the report dated xx/xx/xxxx-xx/xx/xxxx. While the COPP will make sure the addendum is saved with the report and easily available for the public to find, addenda cannot be uploaded or entered directly into CERS by the COPP.

Often-Missed Expenditures

1. *Candidate Filing Fee*: The candidate's filing fee is a mandatory reportable expenditure. The filing fee can be paid either out of the candidate's campaign account (if funds are available), or out-of-pocket by the candidate using personal funds. If personal funds are used, the filing fee needs to be reported as either an in-kind candidate contribution (if the candidate does not want to be reimbursed for that expense) or as an in-kind candidate loan (if the candidate wants to be reimbursed).

2. *Social Media*: Any campaign that spends money on social media ads must disclose this expenditure with the same level of detail as any other paid communication expenditure (e.g. telegram, radio ad, print/digital newspaper ad, Spotify ad, yard signs, etc.). This expenditure listing must directly reference the fact that the material was a social media ad by providing the date(s) the ad ran, the social media platform the ad appeared on, and a brief description of the subject matter. Reference the Expenditures: Paid Communications webpage.

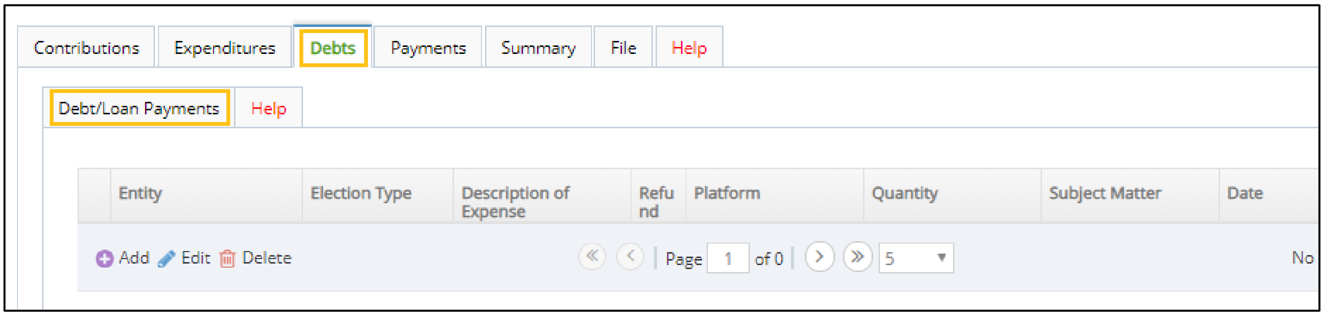
3. *Vendor Fees*: Vendor fees for any contribution-processing vendor (e.g. PayPal, ActBlue, Revv, etc.) must be reported as an expenditure.
    - If a vendor fee applies to online contribution platforms, the following detail must be included: 1) the vendor name as the "entity" (e.g. PayPal, ActBlue, etc.), 2) the election relevant to the contribution fees, and 3) under "Description of Expense," the dates and total value of the contributions represented by the fees. For example: "$35 in ActBlue fees for $185 in contributions received from 10/1-10/15/20."

4. *Gas and Mileage*: Gas and mileage must be reported as an expenditure if paid for from the campaign account (e.g. with a campaign's debit card).
    - If the candidate's campaign uses a rental car for campaign-related expenses, the cost of the rental car and the cost of fuel must each be reported as expenditures.
    - The COPP recommends that candidates who use their personal vehicle for campaign-related travel report the use of the vehicle and fuel costs based on the federal reimbursement rate, which accounts for both the cost of the gas and the cost of the vehicle's use. For example: a 480-mile roundtrip from Billings to Helena, has a value of $278.40 (480 x $0.58).
    - If a candidate uses their personal vehicle, they would report the mileage as either an in-kind loan (if they seek reimbursement from the campaign) or as an in-kind contribution.

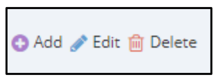
5. *Expenses Related to Paid Communications* (e.g. Facebook, billboard, newspaper, or radio ads) must report: the 1) platform, 2) quantities (the number of materials/ads and/or the dates the ad(s) ran, and the 3) subject matter of the ads. In-depth details are available on the COPP's Expenditures: Paid Communications webpage.

Part 5: Add Debts in CERS

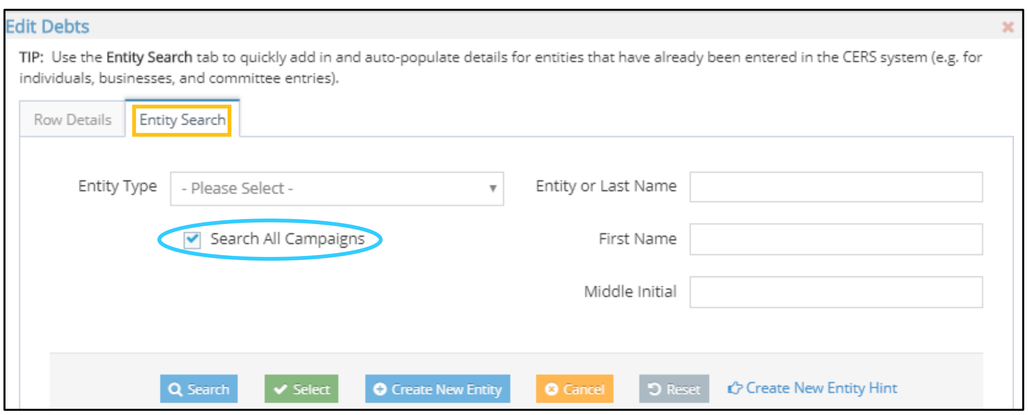
All debts or other monetary obligations (e.g. debts or loans) owed by a campaign must be reported in the subtab of the **Debts** tab.



To add in a debt or loan, select the Debt/Loan Payments subtab, and click the purple **Add** button. Debt and loan information can also be **edited** and **deleted** in this subtab.



Just like with adding in contributions and expenditures, campaigns are also advised to use the **Entity Search** tab to streamline entering in debt and loan data.



The **Entity Search** tab gives the option to auto-populate previously entered expenditure information. If an individual or entity has already been entered in CERS, this search option allows the information to be pulled up and does not require a manual entry.

To search for an individual or entity to identify them as the source of a debt or loan,

1. Select the **Entity Type** (Bank, Business, or Individual).
2. Enter in the entity or individual's name.
3. Make sure to select the **Search All Campaigns** box to search data beyond the data your campaign has entered in CERS.
4. Select the **Search** button to see if the entity or individual already exists in the system.

i. *If* the correct information is in the “Entity Search Results” section, check the box next to the relevant entity, and hit **Select.** You will then be redirected automatically to the **Row Details** screen.
ii. *If* no “Entity Search Results” appear, click **Create New Entity** to manually enter the information. Once the information is entered, click **Submit**. The next screen redirects to the **Row Details** screen.

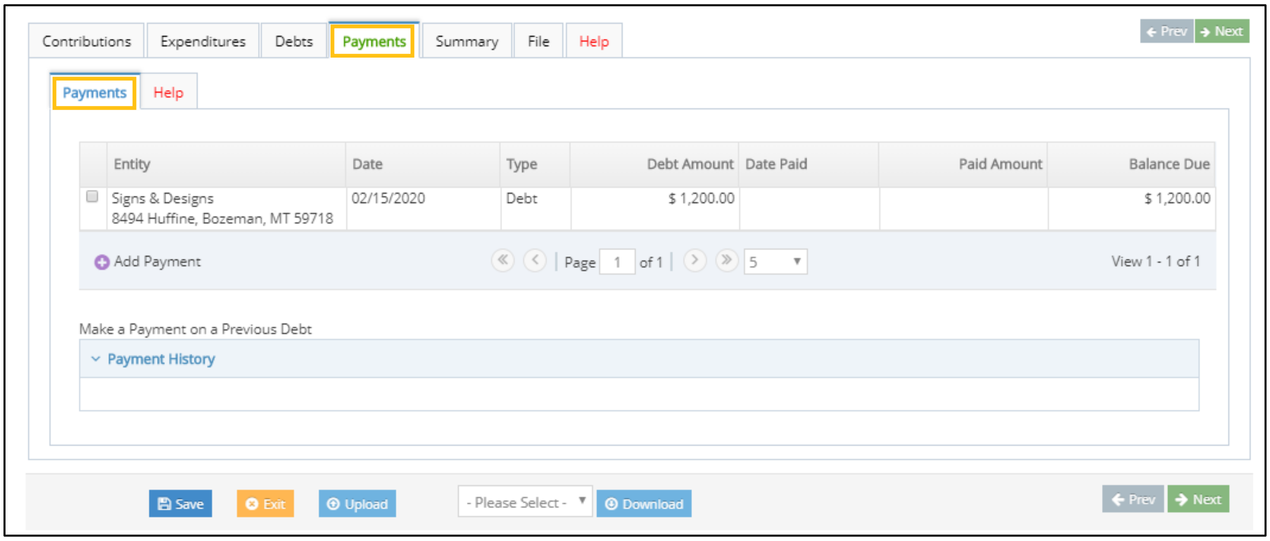
The **Row Details** tab is where users enter specific and identifying information about campaign debts and loans. To enter a debt or loan, disclose:

1. The full name, entity type, and complete mailing address of the individual or business to whom the debt is owed,
2. The election that the debt or loan serves,
3. The date the date was incurred/agreed to,
4. The debt or loan amount (If the exact amount of a debt or obligation is not known, the estimated amount must be reported (44.10.525(2), ARM)).
5. A detailed description of the debt or loan in the **Purpose of Debt** section (a debt or loan description must have the same level of detail as an expenditure description),

Once a new debt has been entered into the **Row Details** section, select the **Submit** button, and then select the blue **Save** button. <u>The **Save** button must be selected after every entry</u> or the CERS system may override that entry or duplicate the entity for each subsequent entry you make.

Part 6: Add Payments (on Debts and Loans) in CERS

All outstanding loans reported in the **Contributions** tab and debts or obligations reported in the **Debts** tab appear in the **Payments** tab.



To enter payments on a loan or debt,

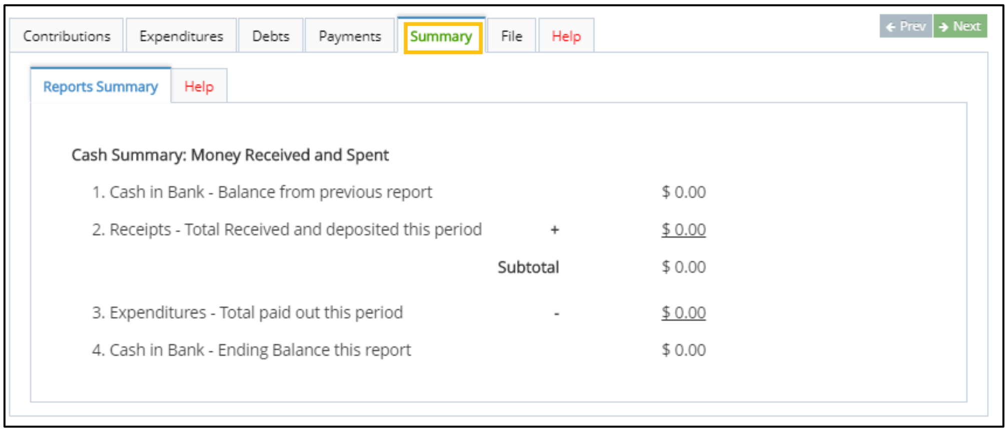
1. Select the check box next to the relevant loan or debt in the **Payments** tab.
2. Then, select the purple **+ Add** button to record a new payment.
3. Enter in the date of the loan or debt payment, the amount paid, click **Submit**, and then **Save**. The **Save** button must be selected after every entry or the CERS system may override that entry or duplicate the entity for each subsequent entry you make.

To view recorded payments that have been made on a loan or debt,

1. Select the check box next to the relevant loan or debt in the **Payments** tab,
2. Then, reference the data in the **Payments History** section.

Part 7: Understand the Summary Tab

The **Summary** tab keeps a running total of money received and spent by the campaign during the current reporting period.



The **Summary** tab details the campaign's bank balance at the start of the reporting period, all monetary contributions received by the campaign, the total amount of all campaign expenditures, and the ending bank balance for both the account (this is done for both the primary and general accounts).

- **Cash in Bank** is the ending balance of the previous report (this will be $0 for the initial report). Please note that the beginning balance (cash in bank) includes all funds the candidate reported as having received on previous finance reports; this includes both contributions and loans.

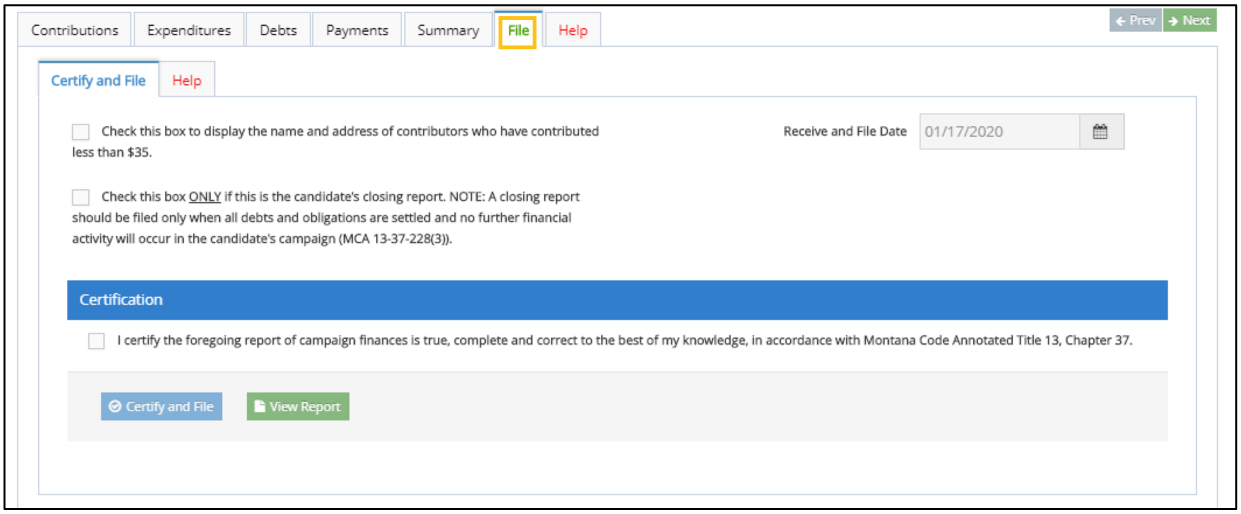
- **Receipts** represent all contributions received during the current reporting period. These are added to the **Cash in Bank** balance and reflected in the **Subtotal** amount.

- **Expenditures** represent all campaign expenditures made by the candidate during the current reporting period and are subtracted from the **Subtotal.**

- The difference between the **Subtotal** and current reporting period **Expenditures** is show in the **Cash in Bank – Ending Balance**. This balance should correspond with the candidate's accounts as of the closing date of the reporting period; that is, the fifth day before the report is due.

Part 8: File a Campaign Finance Report

Select the **File** tab to file a campaign finance report.



There are a few options on the **File** tab:

1. **Display the names and address of contributors who have contributed less than $35?** Select this first box if you want your publicly available campaign finance reports to show information about contributors who made contributions less than $35. If the option is not selected, CERS automatically aggregates those contributions and includes them as one mass contribution on the public view version of the report.
2. **Closing Report:** Select the second box **ONLY** if this is the candidate's closing report. A closing report should ONLY be filed when a candidate's debts and obligations are settled and no further activity will occur (13-37-228(3), MCA). See this link for details about how to close a campaign account and disperse surplus funds.
3. **Certification:** Select the third box to certify that the information in the report is true, complete, and correct to the best of your knowledge. Then, click **Certify and File**.

If a filed campaign finance report needs to be amended later, this is possible by going back to the committee dashboard, selecting the specific report, and selecting the "Update or Amend Report" button.

Part 9: Report Review Process & How to Amend a Campaign Finance Report

The COPP reviews all campaign finance reports and sends the candidate an **Inspection Report**.

An Inspection Report is a COPP inspection that occurs each time a candidate files a campaign finance report leading up to an election. The Inspection Report notes all changes a candidate must make to each campaign finance report in order to comply with Montana law. A CFR Inspection Report will only detail one specific financial report, which will be stated in the "Reference Report" field. Click here to see a sample Inspection Report.

An **Exam** occurs after an election and serves as a final and cumulative inspection of all financial reports filed by a candidate or committee (13-37-123, MCA). All campaign finance reports are included in the **Exam**, and the COPP alerts the candidate or committee to all outstanding items or issues that must be addressed by the candidate or committee.

The COPP is available to assist candidates and committees in correcting or addressing all items noted in the CFR Compliance report. However, it is the responsibility of the candidate or committee to ensure all reporting requirements have been met.

With every **Inspection Report** and the **Exam**, the candidate must amend the specific campaign finance report where issues are noted. A campaign finance report can be amended by navigating back to the candidate dashboard and selecting the blue **Finance Reports** button. Then, select the relevant campaign finance report and select **Update or Amend Report.** Update information as necessary. Save changes. Finally, re-file the campaign finance report (Read more about the COPP's Inspection Report and Exam process here).

Part 10: Post-Election Options for a Campaign Account

This section contains information managing surplus funds and outstanding debts for:

1. Candidates who do not continue after the primary, and
2. Candidates who continue to the primary.

Surplus Campaign Funds after the Primary Election

If you don't advance to the general after the primary election, and your primary campaign account has surplus funds, you have two options for the funds. A candidate may:

1) Return the contributions to contributors, or
2) Donate the funds to a non-profit (this must be reported in a C-5 report as a campaign expenditure).

Note: A candidate may not contribute surplus campaign funds to another campaign, including the candidate's own future campaign (for example, running for the same office during the next election), or use the funds for personal benefit.

If you do advance to the general election, leftover funds may be moved from a candidate's primary account to the general account.

- To report this in a C-5, report the transfer in the C-5 that covers the date the money was transferred. You will report the removal of money from the primary account as a primary expenditure under **Expenditures**. Then, you will report the transfer of the primary funds to your general campaign account under **Contributions** (Fundraiser subtab), as a general fundraiser contribution.

Surplus Campaign Funds after the General Election

If you dispose of all campaign funds by your post-general C-5 reporting deadline, all transactions can be detailed on the post-general C-5 report. Your options to dispose of funds by the post-general C-5 due date are to:

1) Return the funds to contributors. These returned contributions would be reported in your post-general C-5 report as an expenditure. You must include the full name and mailing address of the recipient.
2) Donate the funds to a nonprofit. Report this transaction in a C-5 report as an expenditure.

If you have funds remaining after the post-general C-5 report deadline, you must dispose of the surplus funds within 120 days after you've filed your closing C-5 campaign finance report. You have the following options for the surplus funds:

1) Donate the funds to a nonprofit. These donations must be reported on a C-118 campaign finance form.
2) If elected, you can establish a constituent services account. This requires you to file a C-118C form and put the money in a bank account with "constituent services" in the account title. Please note that there are specific legal requirements for a constituent services account:
    a. You will need to include a copy of the transaction where you've moved money from a campaign account to a constituent services account.
    b. The C-118 C form must be filed with 135 days after you've filed a closing campaign report.
    c. Any candidate who opens a constituent services account is required to file C-8 reports.
    d. Funds in a constituent services account are restricted to being used for certain activities and require detailed accounting and period reports. See 13-37-204 and 402, MCA and 44.11.701, 44.11.703-705, 44.11.707-711 ARM.

Post-Election Outstanding Debts

To pay down campaign debt, you can continue to receive contributions after an election.

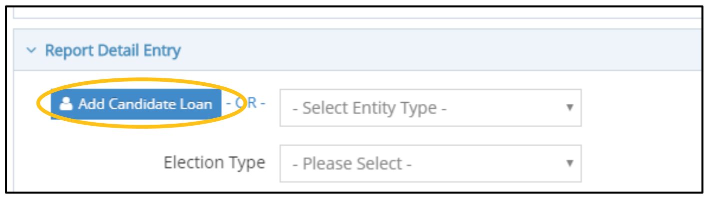
- For example, if you have primary campaign debt, whether you continue to the primary election or not, you can continue to receive primary contributions to pay the campaign loans or debts down.
- Please note that contribution limits apply, they apply per election, and each contribution must be designated for either your campaign's primary or general account and kept separate. You can continue to receive contributions designated for a specific campaign as long as the individual or entity has not reached their contribution limit for that specific election. This explains why general election contributions cannot be applied retroactively to debt accrued and reflected by your primary campaign account.
- Only primary contributions can be applied to primary loans or debts, and only general contributions can be applied to general loans or debts.

If you will no longer seek out contributions to pay for your campaign's debts or loans, you have a few options to close your account and settle outstanding loans and debts:

1. **Option 1:** You can forgive loans you made, as the candidate, to your campaign. First, the self-loan must already have been reported as a loan in a previous C-5 report. Then, to forgive your personal loan to your campaign, simply email the COPP at cppcompliance@mt.gov and state, "I am forgiving my candidate loan of $XXXX money for my campaign."

2. **Option 2:** If your campaign owes outstanding loans and/or debts made to entities that are not yourself (e.g. to a printing company, a vendor, a business, etc.), you may use your personal funds (not your campaign funds) to pay off those obligations.

    i. You will report this as an in-kind loan to your campaign (under Contributions, Loan [Use the blue "**Add Candidate Loan**" button in the "Row Details" section], list the "In-Kind Description" as "campaign debt/loan repayment," or something similar). This will then create a candidate loan for the pending loans or debt balance. Your account will continue to reflect a negative balance with this in-kind candidate loan.



    ii. Then, 'forgive' this 'new' loan by emailing cppcompliance@mt.gov and stating in the email that you will not personally seek reimbursement from the campaign for this in-kind loan, and that the loan was made to pay off existing campaign obligations. You must include the 1) vendor, 2) date, and 3) amount information for those obligations in the email. This explanation is needed because your CERS account will continue to reflect a negative balance for the campaign even after this activity.

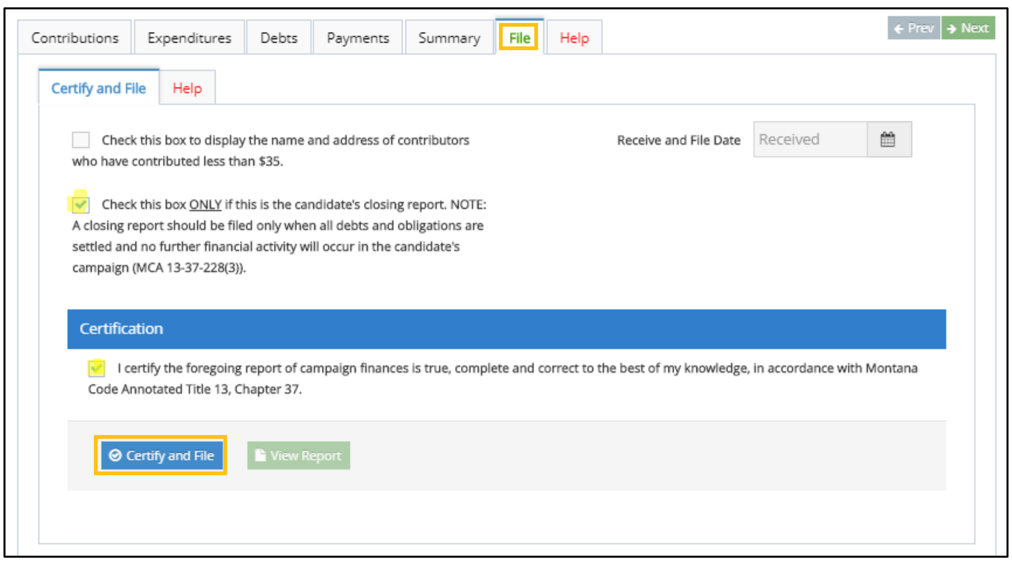
Part 11: Filing a Closing Report

<u>Every candidate must file a closing report.</u> Closing reports must be filed when all debts and obligations are satisfied and no further campaign activity is anticipated following an election.

Some campaigns have continued to make expenditures after the election that are not campaign related. This is not permissible. If all the debts and obligations of the campaign have been met, the closing report has been submitted and there is still a balance in the campaign account the campaign has several options to choose from to dispose of the surplus funds or property. Review Part 10 to understand your options on pending debt and loans or surplus campaign funds.

A closing report is simply a final C-5 that is filed as a closing report. This can also be the candidate's required post-general C-5 report if no campaign account transactions (e.g. paying back outstanding loans or debts) remain.

To file a report as a closing report, simply check the "Is this a closing report" box on the File tab (see below image), certify the information is true, complete, and correct, and file the report.

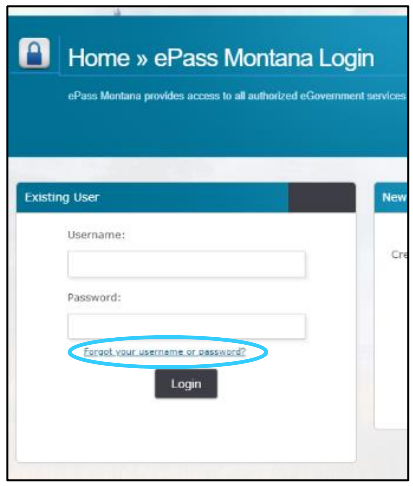


Part 12: Frequently Asked Questions and Tips to Using CERS

1. I forgot my ePass login information or I cannot access CERS with my new ePass account. How do I regain access to my CERS profile?

First, it's important to know that ePass is a State of Montana application that is not unique to the COPP but is used as a portal to access a variety of statewide resources. While users must use ePass to log into their CERS profile, the two systems are different. Whereas CERS is administered directly by the COPP, ePass is not.

If you have trouble accessing your ePass account, or do not remember your account's username or password, you can reset the username or password through ePass itself. The COPP cannot assist you with resetting an ePass account username or password or retrieving an existing username or password you have forgotten.



To reset an ePass username or password, navigate to the ePass page, select **Login**, and then select the **Forgot your username or password?** prompt. The next screen gives you the option to reset both your username and your password or retrieve the existing username or password hint for your profile. If you need further assistance, call the State of Montana's Online Services at (406) 449-3468. If the username or password is changed for the ePass account you used to create the CERS profile, that account should still provide access to CERS.

If you or someone connected to your campaign creates a new ePass profile, with a unique username and password, this new ePass account will **NOT** provide instant access to your previous CERS profile. This account access can be connected to a new ePass account by typing in the **Access ID** in the Access ID tab.

The **Access ID** is a unique code generated by the CERS system (and emailed) after a candidate or committee files in CERS. The **Access ID** links the CERS profile with the ePass account. Entering the **Access ID** will prompt you to re-file the Statement of Candidate/Committee, successful filing of which will tie your CERS profile to the ePass account you used to log into the system, and ensures that any data or information you have entered in CERS (registration, financial reports, etc.) is available each time you log in using that specific ePass account**. Please note that a maximum of one (1) unique ePass account may be tied to a CERS profile at any time.**

If you do not have the **Access ID** for a CERS profile, or you are trying to access CERS via an ePass account beyond the single **Access ID** already tied to the CERS profile, the COPP may be able to assist you. To do this, contact the COPP by emailing cpphelp@mt.gov or cppcompliance@mt.gov, ask for your **Access ID**, and briefly explain the nature of your relationship with the campaign/committee whose CERS profile you wish to access. Upon verification, the COPP will work with you to update your **Access ID**.

Once you receive an updated **Access ID**, log into CERS via ePass and enter that **Access ID** as described above. *Once the **Access ID** for a certain CERS profile is reset by the COPP, any ePass accounts that previously had access to that profile no longer will have access. Keep that in mind before a request to reset the **Access ID** is made, as other individuals who had access to the CERS profile before would no longer have access without using your newly created ePass account or entering the new **Access ID** themselves.*

Please note that the COPP reserves the right to deny an Access ID reset request depending on the circumstances, timing, or nature of the request.

2. When does my campaign finance data in CERS become public?

Data entered into CERS is not public until a campaign finance report is filed. This means that a campaign can enter in financial data the moment a transaction occurs. The COPP strongly advises campaigns to be proactive in entering campaign finance data. There is always a five-day window between a period a report covers (e.g. March 16-April 15) and when the report is due (e.g. April 20). It is not advised for campaigns to wait until the last moment to enter a campaign finance report's data.

3. How do I include an addendum for a campaign finance transaction?

CERS software limits a "Description of Expense" description to 150 characters. If, for example, you have an expenditure for an ad, and all the required ad disclosure details (platform, quantities, and subject matter) cannot fit in the "Description of Expense" line, you can include an addendum in your campaign finance report to include the required details. (An addendum is the same thing as an attachment. It can also reference several line item details from a campaign finance report. The addendum must identify the specific line item [e.g. expenditure] it references.)
To include an addendum in your campaign finance report, this information is required:

1. First, note in the "Description of Expense" description in CERS "See addendum" and include a brief description of the expenditure. For example, "See addendum, $150 Facebook ads"

2. Then, email cppcompliance@mt.gov
   - **Email subject:** Identify that you are sending an addendum and the C-5 report it accompanies by identifying the dates the report covers.
   - **In the email,** identify the line item the addendum links to. For example, "$150 Facebook expenditure details"
   - **Include the missing information either in the email body or as an attachment.**

3. The COPP will upload the addendum's information to the CERS hardcopy database.

Part 13: Campaign Finance Resources

It is a COPP priority that campaign finance be an accessible subject for voters, candidates, committees, lobbyists, and all Montanans. For more details on campaign finance requirements for candidates and treasurers, each candidate and treasurer should familiarize themselves with this Accounting and reporting Manual for Candidates and Treasurers.

This list has links to all the webpages this guide referenced:

- Campaign Finance Laws
- Guide to Registering as a Candidate
- Filing as an Exploratory Candidate
- How to Report a Self-Loan to Your Candidate Campaign Account
- How to Report a Paid Communications, Attribution (Paid for By) Information
- Candidate Campaign Finance Forms
- Candidate Reporting Calendar
- Contribution Limits
- The COPP's Inspection and Exam Process
- How to Close out a Candidate Campaign Finance Account

Questions? Contact the Office of Political Practices!

Candidates and treasurers should contact the COPP office when assistance is needed. We are available to support all candidates and treasurers!

- **Phone:** (406) 444-2942
- **Office:** 1209 8th Avenue, Helena, MT
- **General Email:** cpphelp@mt.gov
- **Compliance Email:** cppcompliance@mt.gov
- **Fax:** 406-444-1643

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YouTube Office of Political Practices